

Donald H. Cram
Tex. State Bar No. 05000300
dhc@severson.com
SEVERSON & WERSON
A Professional Corporation
One Embarcadero Center, Suite 2600
San Francisco, California 94111
Telephone: (415) 398-3344
Facsimile: (415) 956-0439

Attorneys for Secured Creditor
NISSAN MOTOR ACCEPTANCE
COMPANY LLC

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

In re Stephanie Morris Nissan LLC

Case No. 24-30310-mvl

Chapter 7

Debtor.

Nissan Motor Acceptance Company LLC,

Movant,

v.

Stephanie Morris Nissan LLC, and Daniel J.
Sherman, Trustee,

Respondents.

**NISSAN MOTOR ACCEPTANCE COMPANY LLC'S NOTICE OF MOTION FOR
RELIEF FROM THE AUTOMATIC STAY**

PLEASE TAKE NOTICE THAT, Nissan Motor Acceptance Company LLC (“NMAC”) submits this Notice of Motion and Motion for Relief from the Automatic Stay pursuant to §§ 362(d)(1) and 362(d)(2) of the Bankruptcy Code and Rule 4001 of the Federal Rules of Bankruptcy Procedure (the “Motion”), which preliminary hearing is scheduled for April 23, 2024 at 1:30 a.m. via WebEx videoconference only (the “Motion Hearing”). The WebEx video attendance conference link is: <https://us-courts.webex.com/meet/larson> . A copy of the Court’s WebEx video instructions can be found using the following link: <https://www.txnb.uscourts.gov/judges-info/hearing-dates/judge-larson-hearing-dates> .

PURSUANT TO LOCAL BANKRUPTCY RULE 4001-1(b), A RESPONSE IS REQUIRED TO THIS MOTION, OR THE ALLEGATIONS IN THE MOTION MAY BE DEEMED ADMITTED, AND AN ORDER GRANTING THE RELIEF SOUGHT MAY BE ENTERED BY DEFAULT.

ANY RESPONSE SHALL BE IN WRITING AND FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AT EARL CABELL FEDERAL BUILDING, 1100 COMMERCE St., RM. 1254 DALLAS, TX 75242-1496 BEFORE CLOSE OF BUSINESS ON APRIL 15, 2024, WHICH IS AT LEAST 14 DAYS FROM THE DATE OF SERVICE HEREOF. A COPY SHALL BE SERVED UPON COUNSEL FOR THE MOVING PARTY AND ANY TRUSTEE OR EXAMINER APPOINTED IN THE CASE. ANY RESPONSE SHALL INCLUDE A DETAILED AND COMPREHENSIVE STATEMENT AS TO HOW THE MOVANT CAN BE “ADEQUATELY PROTECTED” IF THE STAY IS TO BE CONTINUED.

DATED: March 29, 2024

SEVERSON & WERSON
A Professional Corporation

By: /s/ Donald H. Cram
Donald H. Cram

Attorneys for Secured Creditor
NISSAN MOTOR ACCEPTANCE COMPANY LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing has been served electronically by the Court's ECF System on all parties registered to receive such service on the 30th day of March, 2024.

The undersigned also hereby certifies that a true and correct copy of the foregoing has been served by regular U.S. mail on the debtor at 3815 NW Pkwy., Dallas, TX 75225 on the 30th day of March, 2024.

/s/ Donald H. Cram
Donald H. Cram